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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,) 2:11-CR-00434-LDG-GWF
Plaintiff,)
vs.) **JOINDER IN MOTION TO CONTINUE
IAVOR STOYTACHEV,) TRIAL**
Defendant.)
)

Certificate: This Motion for Joinder is timely filed.

COMES NOW, Defendant, IAVOR STOYTACHEV, by and through his attorney, Osvaldo E. Fumo, Esq, and hereby moves for an order allowing Mr. Stoytchev in joining Defendant MICHAEL VALES Motion to Continue Trial filed by his attorney Chris T. Rasmussen, Esq.

This Motion is based on the interests of Judicial Economy.

DATED: December 13, 2012

Respectfully Submitted,

/s/ Osvaldo E. Fumo
OSVALDO E. FUMO, ESQ.
Attorney for Defendant
IAVOR STOYTACHEV

1 **SUPPLEMENTAL POINTS AND AUTHORITIES**

2 Defendant IAVOR STOYTCHEV hereby adopts the points and authorities submitted by
3 Defendant MICHAEL VALES, and submits the following to supplement that argument.

4 1. Discovery in this case consists of at least eight compact discs. According to the
5 bate stamps there are over 20,000 pages of discovery. Based on the CJA guidelines, if 1 minute
6 per page for discovery review, the amount of discovery in this case would amount to over 330
7 hours, which translates into over two months of forty hour weeks.

8 2. Counsel needs additional time to adequately review discovery and time to go over
9 them with his client.

10 3. Defendant IAVOR STOYTCHEV does not object to the continuance.

11 **CERTIFICATE OF SERVICE**

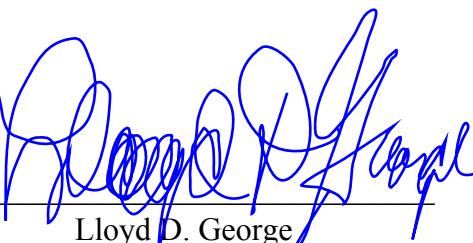
12 I hereby certify that I am an employee of the LAW OFFICE OF OSVALDO E. FUMO,
13 CHTD., and that on the 13th day of December, 2012, I did serve via CM/ECF transmission the
14 foregoing **JOINDER IN MOTION TO CONTINUE TRIAL**.

15 /s/ Kristine Tacata
16 KRISTINE TACATA,
17 *An employee of the Law Office of Osvaldo E. Fumo,*
18 *Chtd.*

19 ORDER

20 IT IS SO ORDERED.

21 DATED this 9 6 day of December, 2012.

22 
23 Lloyd D. George
24 Sr. U.S. District Judge